

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL 1570 (RCC)

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THIS DOCUMENT RELATES TO:

**THOMAS E. BURNETT, SR., ET AL. VS. AL BARAKA  
INVESTMENT AND DEVELOPMENT CORP., ET AL.  
03 CV 9849 (RCC); 03 CV 5738 (RCC)**

**DECLARATION OF JODI WESTBROOK FLOWERS IN SUPPORT OF PLAINTIFFS'  
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT ISLAMIC ASSEMBLY OF NORTH  
AMERICA'S MOTION TO DISMISS WITH SUPPORTING POINTS AND AUTHORITIES**

JODI WESTBROOK FLOWERS declares under penalty of perjury:

1. I am attorney admitted to practice *pro hac vice* before this Court and am a member of MOTLEY RICE LLC, counsel for plaintiffs in *Burnett, et al. v. Al Baraka Investment & Development Corp., et al.*, Civil Action Nos. 03 CV 9849 and 03 CV 5738. I submit this declaration to provide the Court with the exhibits on which Plaintiffs rely in their Memorandum of Law in Opposition to Defendant Islamic Assembly of North America's Motion to Dismiss with Supporting Points and Authorities.

2. Exhibit 1 is a true and accurate copy of a letter prepared by me that was faxed and mailed to counsel for Defendant Islamic Assembly of North America on June 1, 2004, and emailed to counsel for Defendant on June 4, 2004.

3. Exhibit 2 is a true and accurate copy of Plaintiffs' More Definite Statement as to Islamic Assembly of North America filed with the Court on June 4, 2004.

4. Exhibit 3 is a true and accurate copy of the Summons and Proof of Service for Islamic Assembly of North America, dated November 5, 2003.

5. Exhibit 4 is a true and accurate copy of a page downloaded from IANA's

website on June 4, 2004.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2004.



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JODI WESTBROOK FLOWERS